

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

COMPANY DOE,

**Plaintiff,**

vs.

Civil No.: 11-cv-2958-AW

INEZ TENENBAUM, in her official capacity  
as Chairman of the Consumer Product Safety  
Commission, and the CONSUMER PRODUCT  
SAFETY COMMISSION

(UNDER SEAL)

4330 East West Highway,  
Bethesda, MD 20814

**Defendants**

**JOINT MOTION TO UNSEAL PLAINTIFF'S MOTION TO SEAL THE CASE AND TO  
PROCEED UNDER A PSEUDONYM AND PLAINTIFF'S MEMORANDUM OF  
POINTS AND AUTHORITIES IN SUPPORT OF THE MOTION TO SEAL**

On October 17, 2011, plaintiff Company Doe filed several papers pursuant to an accompanying motion to seal the case and proceed under a pseudonym, which motion was accompanied by a supporting memorandum of points and authorities. Although plaintiff requested a seal of the entire case, it was not plaintiff's intention to submit the motion to seal or memorandum in support under seal. Plaintiff intended that these two documents would be publicly available. For purposes of clarity, the parties submit this joint motion and respectfully request the Court to unseal the plaintiff's motion to seal the case and proceed under a pseudonym (Docket No. 2) and the plaintiff's memorandum of points and authorities in support of the

motion to seal the case and proceed under a pseudonym (Docket No. 2, Attach. 1). The parties further request that the Court make these documents available on the Court's Case Management / Electronic Case Filing ("CM/ECF") system. The parties request that these documents be displayed on the CM/ECF system and that the Court make public no additional information about the case save the case caption pending the Court's ruling on plaintiff's motion to seal.

The parties request that this joint motion be submitted under seal pursuant to the plaintiff's motion to seal the case, pending the Court's ruling on said motion.<sup>1</sup>

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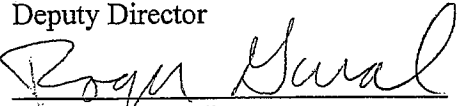
<sup>1</sup> In the event that the Court does not grant the motion to seal the case and proceed under a pseudonym, the parties request the opportunity to consider the withdrawal of this filing or the submission of a redacted version.

Dated: November 4, 2011

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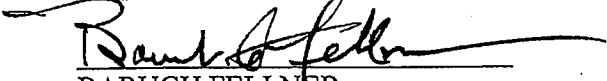
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